

DEPARTMENT OF ENVIRONMENTAL CONSERVATION

AIR QUALITY OPERATING PERMIT

Permit No. 168TVP01
Application No. A000168

Issue Date: December 2, 2002
Expiration Date: January 1, 2008

The Department of Environmental Conservation, under the authority of AS 46.14 and 18 AAC 50, issues an operating permit to the permittee, **BP Exploration (Alaska) Inc.**, for the operation of the **Grind and Inject Facility**.

This permit satisfies the obligation of the owner and operator to obtain an operating permit as set out in AS 46.14.130(b).

As set out in AS 46.14.120(c), the permittee shall comply with the terms and conditions of this operating permit.

This Operating Permit becomes effective January 2, 2003.

John F. Kuterbach, Manager
Air Permits Program

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List of Abbreviations Used in this Permit

AAC	Alaska Administrative Code
ADEC	Alaska Department of Environmental Conservation
AS	Alaska Statutes
ASTM	American Society for Testing and Materials
BACT	Best Available Control Technology
C.F.R.	Code of Federal Regulations
CO	Carbon Monoxide
dscf	Dry standard cubic foot
EPA	US Environmental Protection Agency
gr./dscf	grain per dry standard cubic foot (1 pound = 7000 grains)
GPH	gallons per hour
HAPs or HACs	Hazardous Air Pollutants or Hazardous Air Contaminants [<i>HAPs</i> or <i>HACs</i> as defined in AS 46.14.990(14)]
ID	Source Identification Number
kPa	kiloPascals
MACT	Maximum Achievable Control Technology as contained in 40 C.F.R. 63
MR&R	Monitoring, Recordkeeping, and Reporting
NESHAPs	Federal National Emission Standards for Hazardous Air Pollutants [<i>NESHAPs</i> as contained in 40 C.F.R. 61]
NO _x	Nitrogen Oxides
NSPS	Federal New Source Performance Standards [<i>NSPS</i> as contained in 40 C.F.R. 60]
O ₂	Oxygen
ppm	Parts per million
ppmv	Parts per million by volume
ppmvd	Parts per million by volume dry
PM-10	Particulate Matter less than or equal to a nominal ten microns in diameter
PS	Performance specification
PSD	Prevention of Significant Deterioration
PTE	Potential to Emit
RM	Reference Method
SIC	Standard Industrial Classification
SO ₂	Sulfur dioxide
TPH	Tons per hour
tpy	Tons per year
VOC	volatile organic compound [<i>VOC</i> as defined in 18 AAC 50.990(103)]
wt%	weight percent

Section 1. Identification

Names and Addresses

Permittee: **BP Exploration (Alaska) Inc.**
900 E. Benson Boulevard, P.O. Box 196612
Anchorage, Alaska 99519-6612

Facility Name: **Grind and Inject Facility**

Location: Section 11, Township 11N, Range 14E, Umiat Meridian

Physical Address: Section 11, Township 11N, Range 14 E, Umiat Meridian

Owners:

BP Exploration (Alaska) Inc 900 E. Benson Blvd (zip 99508) P.O. Box 196612 Anchorage, AK 99519-6612	Phillips Alaska, Inc. 700 G Street (zip 99501) P.O. Box 100360 Anchorage, AK 99510- 0360
Texaco Exploration & Production Inc. 1970 China Grade Loop P.O. Box 5197X (zip 93388) Bakersfield, CA 93308	Forest Oil Corporation 301 K Street, Suite 700 Anchorage, AK 99501
ExxonMobil Alaska Production Inc. 3301 C Street (zip 99503) P.O. Box 196601 Anchorage, AK 99519-6601	Chevron U.S.A. Inc. 11111 S. Wilcrest (zip 77099) P.O. Box 36366 Houston, TX 77236
Union Oil Company of California 909 West 9 th Ave (zip 99501) P.O. Box 36366 Houston, TX 77236	

Operator: **BP Exploration (Alaska) Inc.**
900 E. Benson Boulevard, P.O. Box 196612
Anchorage, Alaska 99519 - 6612

Permittee's Responsible Official: **Craig L. Wiggs, GPB Operations Manager**

Designated Agent: **CT Corporation**
801 W 10th St, Suite 300
Juneau, AK 99801

Facility and Building Contact: **Randy Burdick/Mark Pokorny**
(907) 659-5734

Fee Contact: **James A. Pfeiffer, Air Specialist**

SIC Code of the Facility: 1311 Crude Petroleum and Natural Gas

NAICS Code: 211111

[18 AAC 50.350(b)(1), 1/18/97]

Section 2. *General Emission Information*

Emissions of Regulated Air Contaminants, as provided in the permittee's application:

Nitrogen oxides, carbon monoxide, sulfur dioxide, Particulate Matter (PM-10), volatile organic compounds, and hazardous air pollutants (HAPs).

Operating Permit Classifications:

- (1) 18 AAC 50.325(b)(3). The Grind and Inject Facility is a facility containing a source subject to the standards adopted by reference in 18 AAC 50.040 (a)(2)(FF).

Facility Classifications as described under 18 AAC 50.300(b) through (e):

None

[18 AAC 50.350(b)(1), 1/18/97]

Section 3. Source Inventory and Description

Sources listed in Table 1 have specific monitoring, record keeping, or reporting conditions in this permit. Source descriptions and ratings are given for identification purposes only.

[18 AAC 50.350(d)(2) 1/18/97]

Table 1 - Source Inventory

ID	Source Name	Source Description	Rating/size	Installation Date
1	Grind and Inject Facility (Module Numbers 09-4901 [Injection], 09-4902 [Ball Mill], 09-4903 [Auger Conveyor])	Crusher, grinding mill	149 tons/hr	1994

Section 4. Fee Requirements

- 1. General.** The permittee shall pay assessed fees in accordance with AS 46.14.240 -- 250 and 18 AAC 50.400 -- 420.

[18 AAC 50.350(c) & 18 AAC 50.400 – 420, 1/18/97]

- 2. Assessable Emissions.** The gas-fired heater is not subject to any emission standard in the NSPS. Therefore, according to note number 4 of 18 AAC 50.346(a)(1), there are no emission fees.

[18 AAC 50.346(a)(1), 5/3/02]

Section 5. Source-Specific Requirements

Sources Subject to Federal New Source Performance Standards (NSPS), Subpart A

3. **NSPS Subpart A Startup, Shutdown, & Malfunction Requirements.** The permittee shall maintain records regarding Source ID 1 in accordance with 40 CFR 60.7(b).

[18 AAC 50.040(a)(1), 7/2/00]
[40 C.F.R. 60.7(b), Subpart A, 7/1/99]

4. **NSPS Subpart A Good Air Pollution Control Practice.** The permittee shall maintain and operate Source ID 1 in accordance with 40 CFR 60.11(d).

[18 AAC 50.040(a)(1), 7/2/00]
[40 C.F.R. 60.11(d), Subpart A, 7/1/99]

5. **NSPS Subpart A Credible Evidence.** The credible evidence doctrine as provided in 40 CFR 60.11(g) applies to Source ID 1.

[18 AAC 50.040(a)(1), 7/2/00]
[40 C.F.R. 60.11(g), Subpart A, 7/1/99]

6. **NSPS Subpart A Concealment of Emissions.** The permittee shall not conceal emissions from Source ID 1 as provided in 40 CFR 60.12. Monitoring shall consist of an annual certification that the permittee does not conceal emissions.

[18 AAC 50.040(a)(1), 7/2/00]
[40 C.F.R. 60.12, Subpart A, 7/1/99]

Nonmetallic Mineral Processing Plants Subject to NSPS, Subpart OOO

7. **NSPS Subpart OOO Standards for Particulate Matter.** The building enclosing the NSPS subpart OOO-affected facilities shall comply with the emission limits specified in 40 CFR 60.672(e)(1) & (2).

[18 AAC 50.040(a)(2)(FF), 7/2/00]
[40 C.F.R. 60.672(e)(1) & (2), Subpart OOO, 7/1/99]

8. **NSPS Subpart OOO Standards for Visible Emissions.** The permittee shall comply with the emission limits specified in 40 CFR 60.672(h).

[40 C.F.R. 60.672(h), Subpart OOO, 7/1/99]

9. **Monitoring – Determine compliance with conditions 7 and 8 in accordance with 40 CFR 60.675(a), (b), (d), (e), (g), and (h) and 40 CFR 60.8.**

[18 AAC 50.040(a)(2)(FF), 7/2/00]
[40 C.F.R. 60.675, Subpart OOO, 7/1/99]
[40 CFR 60.8, Subpart A, 7/1/99]
[18 AAC 50.350(g)(4)(A), 7/2/00]

10. Recordkeeping: Record all information required for reporting under condition 11.

[18 AAC 50.040(a)(2)(FF), 7/2/00]
[40 C.F.R. 60.676, Subpart OOO, 7/1/99]
[18 AAC 50.350(h), 7/2/00]

11. Reporting:

[18 AAC 50.040(a)(2)(FF), 7/2/00]
[40 C.F.R. 60.676, Subpart OOO, 7/1/99]
[18 AAC 50.350(i), 7/2/00]

- 11.1 The permittee shall submit written reports of performance test results in accordance with §60.676(f).

[40 C.F.R. 60.676(f), Subpart OOO, 7/1/99]

- 11.2 The permittee of any screening operation, bucket elevator, or belt conveyor that processes saturated material and is subject to §60.672(h) and subsequently processes unsaturated materials, shall submit a report in accordance with §60.676(g).

[40 C.F.R. 60.676(g), Subpart OOO, 7/1/99]

- 11.3 Report any excess emissions, in accordance with condition 28, whenever the emission limits of conditions 7 and/or 8 are exceeded.

[18 AAC 50.350(i)(1), 1/18/97]

Section 6. Generally Applicable Requirements

- 12. Asbestos NESHAP.** The permittee shall comply with the requirements set forth in 40 C.F.R. 61.145, 61.150, and 61.152, and the applicable sections set forth in 40 C.F.R. 61, Subpart A and Appendix A.

[18 AAC 50.040(b)(3) & 50.350(d)(1), 1/18/97]
[40 C.F.R. 61, Subparts A & M, 12/19/96]

- 13. Refrigerant Recycling and Disposal.** The permittee shall comply with the applicable standards for recycling and emission reduction of refrigerants as set forth in 40 C.F.R. 82.154, §82.156, §82.161, §82.162, and §82.166.

[18 AAC 50.040(d) & 50.350(d)(1), 1/18/97]
[40 C.F.R. 82, Subpart F, 7/1/97]

- 14. Technology-Based Emission Standard.** If an unavoidable emergency, malfunction, or non-routine repair, as defined in 18 AAC 50.235, causes emissions in excess of a technology-based emission standard, the permittee shall take all reasonable steps to minimize levels of emissions that exceed the standard and shall give written notice to the department within two working days after the event commenced or was discovered. Notice to the department must include the information stated in 18 AAC 50.235(a)(2).

[18 AAC 50.235(a) & 50.350(f)(3), 1/18/97]

- 15. Permit Renewal.** To renew this permit, the permittee shall submit an application under 18 AAC 50.335 no sooner than July 3, 2006 and no later than July 2, 2007 to renew this permit.

[18 AAC 50.335(a), 1/18/97]

Section 7. General Source Testing and Monitoring Requirements

- 16. Requested Source Tests.** In addition to any source testing explicitly required by the permit, the permittee shall conduct source testing as requested by the department to determine compliance with applicable permit requirements.

[18 AAC 50.220(a), 1/18/97 & 18 AAC 50.345(a) & (k), 5/3/02]

- 17. Operating Conditions.** Unless otherwise specified by an applicable requirement or test method, the permittee shall conduct source testing

[18 AAC 50.220(b) & 50.350(g), 1/18/97]

17.1 at a point or points that characterize the actual discharge into the ambient air; and

17.2 at the maximum rated burning or operating capacity of the source or another rate determined by the department to characterize the actual discharge into the ambient air.

- 18. Reference Test Methods.** The permittee shall use the following as reference test methods when conducting source testing for compliance with this permit:

18.1 Source testing for compliance with requirements adopted by reference in 18 AAC 50.040(a) must be conducted in accordance with the methods and procedures specified in 40 C.F.R. 60.

[18 AAC 50.040(a), 7/2/00]

[18 AAC 50.220(c)(1)(A) & 50.350(g), 1/18/97]

[40 C.F.R. 60, 7/1/99]

18.2 Source testing for emissions of total particulate matter, sulfur compounds, nitrogen compounds, carbon monoxide, lead, volatile organic compounds, fluorides, sulfuric acid mist, municipal waste combustor organics, metals, and acid gases must be conducted in accordance with the methods and procedures specified in 40 C.F.R. 60, Appendix A.

[18 AAC 50.040(a)(4), 7/2/00]

[18 AAC 50.220(c)(1)(E) & 50.350(g), 1/18/97]

[40 C.F.R. 60, Appendix A, 7/1/99]

18.3 Source testing for emissions of any contaminant may be determined using an alternative method approved by the department in accordance with 40 C.F.R. 63 Appendix A, Method 301.

[18 AAC 50.040(c)(19), 7/2/00]

[18 AAC 50.220(c)(2) & 50.350(g), 1/18/97]

[40 C.F.R. 63, Appendix A, Method 301, 7/1/99]

- 19. Excess Air Requirements.** To determine compliance with this permit, standard exhaust gas volumes must only include the volume of gases formed from the theoretical combustion of fuel, plus the excess air volume normal for the specific source type, corrected to standard conditions (dry gas at 68° F and an absolute pressure of 760 millimeters of mercury).

[18 AAC 50.220(c)(3), 18 AAC 50.350(g), 1/18/97 & 18 AAC 50.990(88), 5/3/02]

- 20. Test Deadline Extension.** The permittee may request an extension to a source test deadline established by the department. The permittee may delay a source test beyond the original deadline only if the extension is approved in writing by the department's appropriate division director or designee.

[18 AAC 50.345(a) & (l), 5/3/02]

- 21. Test Plans.** Before conducting any source tests, the permittee shall submit a plan to the department. The plan must include the methods and procedures to be used for sampling, testing, and quality assurance and must specify how the source will operate during the test and how the permittee will document that operation. The permittee shall submit a complete plan within 60 days after receiving a request under condition 16 and at least 30 days before the scheduled date of any test, unless a plan was submitted within the previous six months for testing the same pollutants for the same equipment. In such an event, the previous plan may be referenced. Retesting may be done without resubmitting the plan. The permittee is not required to comply with this condition when the source is observed for visible emissions.

[18 AAC 50.345(a) & (m), 5/3/02]

- 22. Test Notification.** At least 10 days before conducting a source test, the permittee shall give the department written notice of the date and the time the source test will begin. The permittee is not required to comply with this condition when the source is observed for visible emissions.

[18 AAC 50.345(a) & (n), 5/3/02]

- 23. Test Reports.** Within 60 days after completing a source test, the permittee shall submit two copies of the results in the format set out in the *Source Test Report Outline*, adopted by reference in 18 AAC 50.030. The permittee shall certify the results in the manner set out in condition 16. If requested in writing by the department, the permittee must provide preliminary results in a shorter period of time specified by the department. The permittee is not required to comply with this condition when the source is observed for visible emissions.

[18 AAC 50.345(a) & (o), 5/3/02]

Section 8. General Recordkeeping, Reporting, and Compliance Certification Requirements

- 24. Certification.** The permittee shall certify all reports, compliance certifications, or other documents submitted to the department and required under the permit by including the signature of a responsible official for the permitted facility following the statement: “Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete.” Excess emission reports must be certified by the end of the month following the month in which excess emissions occurred. All other reports and documents must be certified upon submittal. All other reports and other documents must be certified upon submittal. When certifying a compliance certification, the official’s signature must be notarized.

[18 AAC 50.205 and 50.350(b)(3) & (j), 1/18/97; and 18 AAC 50.345(a) & (j), 5/3/02]

- 25. Submittals.** Unless otherwise directed by the department or this permit, the permittee shall send reports, compliance certifications, and other documents required by this permit to ADEC, Air Permits Program, 610 University Ave., Fairbanks, AK 99709-3643, ATTN: Compliance Technician.

[18 AAC 50.350(i), 1/18/97]

- 26. Information Requests.** The permittee shall furnish to the department, within a reasonable time, any information the department requests in writing to determine whether cause exists to modify, revoke and reissue, or terminate the permit or to determine compliance with the permit. Upon request, the permittee shall furnish to the department copies of records required to be kept by the permit. The department may require the permittee to furnish copies of those records directly to the federal administrator.

[18 AAC 50.200 & 50.350(b)(3), 1/18/97; and 18 AAC 50.345(a) & (i) & 50.350(g) – (i), 5/3/02]

- 27. Recordkeeping Requirements.** The permittee shall keep all records required by this permit for at least five years after the date of collection, including:

[18 AAC 50.350(h), 1/18/97]

27.1 copies of all reports and certifications submitted pursuant to this section of the permit; and

27.2 records of all monitoring required by this permit, and information about the monitoring including:

- a. calibration and maintenance records, original strip chart or computer-based recordings for continuous monitoring instrumentation;
- b. sampling dates and times of sampling or measurements;
- c. the operating conditions that existed at the time of sampling or measurement;

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- d. the date analyses were performed;
 - e. the location where samples were taken;
 - f. the company or entity that performed the sampling and analyses;
 - g. the analytical techniques or methods used in the analyses; and
 - h. the results of the analyses.

28. Excess Emissions and Permit Deviation Reports.

28.1 The permittee shall report all emissions or operations that exceed or deviate from the requirements of this permit as follows:

- a. in accordance with 18 AAC 50.240(c), as soon as possible after the event commences or is discovered, report
 - (i) emissions that present a potential threat to human health or safety; and
 - (ii) excess emissions that the permittee believes to be unavoidable;
- b. in accordance with 18 AAC 50.235(a), within two working days after the event commenced or was discovered, report an unavoidable emergency, malfunction, or nonroutine repair that causes emissions in excess of a technology based emission standard;
- c. report all other excess emissions and permit deviations
 - (i) within 30 days of the end of the month in which the emissions or deviation occurs, except as provided in conditions 28.1c(ii) and 28.1c(iii);
 - (ii) if a continuous or recurring excess emissions is not corrected within 48 hours of discovery, within 72 hours of discovery unless the department provides written permission to report under condition 28.1c(i); and
 - (iii) for failure to monitor, as required in other applicable conditions of this permit.

28.2 When reporting excess emissions, the permittee must report using either the department's online form, which can be found at www.dec.state.ak.us/awq/excess/report.asp, or, if the permittee prefers, the form contained in Section 11 of this permit. The permittee must provide all information called for by the form that is used.

28.3 When reporting a permit deviation, the permittee must report using the form contained in Section 11 of this permit. The permittee must provide all information called for by the form.

28.4 If requested by the department, the permittee shall provide a more detailed written report as requested to follow up an excess emissions report.

[18 AAC 50.235(a)(2), 50.240(c), & 50.350(i), 1/18/97; and 18 AAC 50.346(a)(3), 5/3/02]

29. NSPS and NESHAP Reports. The permittee shall:

[18 AAC 50.040, 1/18/97]

[18 AAC 350(i)(2), 1/18/97]

[40 C.F.R. 60 & 40 C.F.R. 61, 7/1/99]

29.1 submit to the department copies of any NSPS and NESHAPs reports submitted to the U.S. Environmental Protection Agency (EPA) Region 10, and

29.2 upon request by the department, provide the department a written copy of any U.S. EPA granted waiver of the federal emission standards, record keeping, monitoring, performance testing, or reporting requirements, or approved custom monitoring schedules.

[18 AAC 50.040, 7/2/00 & 18 AAC 350(i)(2), 1/18/97]

[Federal Citation 40 C.F.R. 60 & 40 C.F.R. 61, 7/1/99]

30. A report submitted under conditions 23, 28, and 29 shall constitute the Facility Operating Report. No regularly scheduled report is required for this facility.

[18 AAC 50.350(d)(4), 1/18/97]

31. Annual Compliance Certification. Each year by March 31, and for reporting periods following the effective date of this permit, the permittee shall compile and submit to the department an original and two copies of an annual compliance certification report as follows:

[18 AAC 50.350(j), 1/18/97]

31.1 For each permit term and condition set forth in Section 5 through Section 8, including terms and conditions for monitoring, reporting, and recordkeeping:

[18 AAC 50.350(d)(3), 1/18/97]

- a. certify the compliance status over the preceding calendar year consistent with the monitoring required by this permit;
- b. state whether compliance is intermittent or continuous;
- c. briefly describe each method used to determine the compliance status; and
- d. notarized the responsible official's signature.

[18 AAC 50.205, 1/18/97 & 50.345(a) & (j), 5/3/02]

31.2 In addition, submit a copy of the report directly to the EPA-Region 10, Office of Air Quality, M/S OAQ-107, 1200 Sixth Avenue, Seattle, WA 98101.

[18 AAC 50.350(j), 1/18/97]

Section 9. Standard Conditions Not Otherwise Included in the Permit

- 32.** The permittee must comply with each permit term and condition. Noncompliance with a permit term or condition constitutes a violation of AS 46.14, 18 AAC 50, and, except for those terms or conditions designated in the permit as not federally enforceable, the Clean Air Act, and is grounds for

32.1 an enforcement action;

32.2 permit termination, revocation and reissuance, or modification in accordance with AS 46.14.280; or

32.3 denial of an operating-permit renewal application.

[18 AAC 50.350(b)(3), 1/18/97 & 18 AAC 50.345(a) & (c), 5/3/02]

- 33.** It is not a defense in an enforcement action to claim that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with a permit term or condition.

[18 AAC 50.350(b)(3), 1/18/97 & 18 AAC 50.345(a) & (d), 5/3/02]

- 34.** Each permit term and condition is independent of the permit as a whole and remains valid regardless of a challenge to any other part of the permit.

[18 AAC 50.350(b)(3), 1/18/97 & 18 AAC 50.345(a) & (e), 5/3/02]

- 35.** Compliance with permit terms and conditions is considered to be compliance with those requirements that are

35.1 included and specifically identified in the permit; or

35.2 determined in writing in the permit to be inapplicable.

[18 AAC 50.350(b)(3), 1/18/97 & 18 AAC 50.345(a) & (b), 5/3/02]

- 36.** The permit may be modified, reopened, revoked and reissued, or terminated for cause. A request by the permittee for modification, revocation and reissuance, or termination or a notification of planned changes or anticipated noncompliance does not stay any permit condition.

[18 AAC 50.350(b)(3), 1/18/97 & 18 AAC 50.345(a) & (f), 5/3/02]

- 37.** The permit does not convey any property rights of any sort, nor any exclusive privilege.

[18 AAC 50.350(b)(3), 1/18/97 & 18 AAC 50.345(a) & (g), 5/3/02]

- 38.** The permittee shall allow the department or an inspector authorized by the department, upon presentation of credentials and at reasonable times with the consent of the owner or operator to

38.1 enter upon the premises where a source subject to the permit is located or where records required by the permit are kept;

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- 38.2 have access to and copy any records required by the permit;
 - 38.3 inspect any facility, equipment, practices, or operations regulated by or referenced in the permit; and
 - 38.4 sample or monitor substances or parameters to assure compliance with the permit or other applicable requirements.

[18 AAC 50.350(b)(3), 1/18/97 & 18 AAC 50.345(a) & (h), 5/3/02]

Section 10. Permit As Shield from Inapplicable Requirements

In accordance with AS 46.14.290, and based on information supplied in the facility application, this section of the permit contains the requirements determined by the department not to be applicable to the **Grind and Inject Facility**.

Table 2 identifies the sources that are not subject to the specified requirements at the time of permit issuance. Some of the requirements listed below may become applicable during the permit term due to an invoking event, even though the requirement is deemed inapplicable at the time of permit issuance.

- 39.** If any of the requirements listed in Table 2 become applicable during the permit term, the permittee shall comply with such requirements on a timely basis. The permittee shall also apply for a construction permit or an operating permit revision, if necessary.

Table 2 - Permit Shields Granted.

Source ID	Non Applicable Requirements	Reason for non-applicability
09-1401	40 CFR 60 Subpart D	Heat input capacities below threshold (250 MMBtu/hr), and units not classified as Fossil-Fuel-Fired Steam Generators, as defined in subpart.
09-1401	40 CFR 60 Subpart Da	Heat input capacities below threshold (250 MMBtu/hr), and units not classified as Fossil-Fuel-Fired Steam Generators, as defined in subpart.
09-1401	40 CFR 60 Subpart Db	Heat input capacities below threshold (100 MMBtu/hr), and commenced construction after effective date of subpart (6/20/84 to 6/19/86).
09-1401	40 CFR 60, Subpart Dc	Per EPA memorandum (Control Number PS36) dated November 17, 1992, a device is not considered a steam generating unit under Subpart Dc if it transfers heat to a heat transfer medium by direct contact or intermixing of the combustion gases and the heat transfer medium. The sea water heater operates with combustion gases making direct contact with seawater.
1	40 CFR 60 Subpart LL	Facility does not meet the definition for metallic mineral processing plant.
1	40 CFR 60 Subpart OOO §60.674, §60.675(f), §60.676(c) – (e)	Facility does not use a wet scrubber to control emissions.
1	40 CFR 60 Subpart OOO §60.676(a)	Facility is not seeking to comply with §60.670(d).
1	40 CFR 60, Subpart A, §60.7(c) & (d)	The provision of §60.7(c) and (d) apply only to New Source Performance Standards which require the installation of a continuous monitoring system (CMS) or monitoring device, as defined in §60.2.
1	40 CFR 60 Subpart OOO §§60.672(b) and (c)	BPXA elects to comply with §60.672(e). 40 CFR 60.672(b) and (c) do not apply to §60.672(e).

Source ID	Non Applicable Requirements	Reason for non-applicability
1	40 CFR 60 Subpart OOO §60.672(f)	Facility does not operate any baghouse control devices.
1	40 CFR 60 Subpart OOO §60.672(g)	Facility does not operate multiple storage bins with combined stack emissions.
1	40 CFR 60 Subpart OOO §§60.675(c)	The testing requirements of §§60.675(c) do not apply because the affected source is not determining compliance with the standards of §§60.672(b) and (c).
1	40 CFR 60 Subpart A – General Provisions §60.7(a)(1) and (a)(3) – Notification and Recordkeeping (Initial Notifications)	The requirements to submit initial notifications have been completed as required. For purposes of the operating permit, the notification provisions are a one-time requirement, as a new construction would trigger a permit review. The department states that this requirement would apply if a triggering event occurs. We remind the department that such requirements are not precluded from being included in the permit shield because of the requirement stated in Condition 39 of the permit.
1	40 CFR 60 Subpart A – General Provisions §60.7(a)(4)	This requirement only applies to “existing” facilities that commenced construction before the applicable date of a subpart under 40 CFR 60 and is, therefore, not affected by the subpart, but could be if the facility were modified or reconstructed (see the definition of an “existing facility” in §60.2). The G&I is an “affected” facility (as defined by §60.2, not an “existing facility.”
40 CFR 61 (Activities subject to Subpart M – standard for Demolition and Renovation (§61.145))		
1	40 CFR 61 Subpart A §61.05(a) - Prohibited Activities §61.07 - Application for Approval of Construction or Modification §61.09 - Notification of Startup	Owners or operators of demolition and renovation operations are exempt from the requirements of §§61.05(a), 61.07, and 61.09 [ref. 40 CFR 61.145(a)(5)]
1	§61.10 - Source Reporting and Waiver Request	Demolition and renovation operations are exempt from §61.10(a) [ref. 40 CFR 61.153(b)]
1	§61.13 - Emission Tests §61.14 - Monitoring Requirements	Emission tests and monitoring are not required under the standards for demolition and renovation [§61.145]
40 CFR 61		
1	40 CFR 61 Subpart M §§61.142 – 61.144 §§61.146 – 61.149 §61.151 §§61.154 – 61.155	G&I facility does not conduct operations or activities affected by the referenced standards.
1	40 CFR 61 Subpart M §61.153 Reporting	No reporting requirements apply for sources subject to §61.145 (demolition and renovation) [ref. §61.153(a)]

Source ID	Non Applicable Requirements	Reason for non-applicability
40 CFR 63		
1	40 CFR Part 63 – National Emission Standards for Hazardous Air Pollutants for Source Categories	The facility, which is a minor source of HAPs, is not regulated by any standard or provision under Part 63
40 CFR 64		
1	40 CFR 64 - Compliance Assurance Monitoring	The facility does not operate any pollutant-specific emission unit that meets the applicability criteria under §64.2(a).
40 CFR 68		
1	40 CFR 68 - Accidental Release Prevention Requirements: Risk Management Programs [§112(r)]	G&I does not store, process or transport regulated flammable or toxic substances in excess of threshold quantities.
40 CFR 82		
1	40 CFR 82 – Stratospheric Ozone Protection §82.1 Subpart A	Facility does not produce, transform, destroy, import or export Class 1 or Group I or II substances or products.
1	§82.30 Subpart B	Facility does not service motor vehicle air conditioners.
1	§82.60 Subpart C	Facility is not a manufacturer or distributor of Class I and II products or substances.
1	§82.80 Subpart D	Subpart applies only to Federal departments, agencies, and instrumentalities.
1	§82.100 Subpart E	Facility is not a manufacturer or distributor of Class I and II products or substances.
1	§82.158, §82.160, §82.164 Subpart F	§82.158: Facility does not manufacture or import recovery and recycling equipment. §82.160: Facility does not contract equipment testing organizations to certify recovery and recycling equipment. §82.164: Facility does not sell reclaimed refrigerant.
1	§82 Subpart F, Appendix C	Facility is not a third party entity that certifies recovery equipment.
1	§82 Subpart F, Appendix D	Facility does not have a technician certification program.
1	§82 Subpart G	Facility does not use Halon or any substitute ozone-depleting compounds for any purpose.
1	§82 Subpart H	Facility does not use Halon, Halon blends, Halon products, or Halon-containing equipment.

[18 AAC 50.350(l), 1/18/97]

Section 11. ADEC Notification Form

Fax this form to: (907) 269-7508 Telephone: (907) 269-8888

BP Exploration (Alaska) Inc.

Company Name

Grind and Inject Facility

Facility Name

Reason for notification:

☐ **Excess Emissions**

*If you checked this box
Fill out section 1*

☐ **Other Deviation from Permit Condition**

*If you checked this box
fill out section 2*

When did you discover the Excess Emissions or Other Deviation:

Date: __/__/__ Time:__:__

Section 1. Excess Emissions

(a) Event Information (Use 24-hour clock):

	START Time: (hr:min):	END Time:	Duration
Date: _____	_____:	_____:	_____:
Date: _____	_____:	_____:	_____:
		Total:	_____:

(b) Cause of Event (Check all that apply):

<input type="checkbox"/> START UP	<input type="checkbox"/> UPSET CONDITION	<input type="checkbox"/> CONTROL EQUIPMENT
<input type="checkbox"/> SHUT DOWN	<input type="checkbox"/> SCHEDULED MAINTENANCE	<input type="checkbox"/> OTHER _____

Attach a detailed description of what happened, including the parameters or operating conditions exceeded.

(c) Sources Involved:

Identify each emission source involved in the event, using the same identification number and name as in the permit. List any control device or monitoring system affected by the event. Attach additional sheets as necessary.

Source ID No.	Source Name	Description	Control Device
_____	_____	_____	_____
_____	_____	_____	_____

(d) Emission Limit Potentially Exceeded

Identify each emission standard potentially exceeded during the event. Attach a list of ALL known or suspected injuries or health impacts. Identify what observation or data prompted this report. Attach additional sheets as necessary.

Permit Condition	Limit	Emissions Observed
_____	_____	_____
_____	_____	_____

(e) Excess Emission Reduction:

Attach a description of the measures taken to minimize and/or control emissions during the event.

(f) Corrective Actions:

Attach a description of corrective actions taken to restore the system to normal operation and to minimize or eliminate chances of a recurrence.

(g) Unavoidable Emissions:

Do you intend to assert that these excess emissions were unavoidable?

☐ YES ☐ NO

Do you intend to assert the affirmative defense of 18 AAC 50.235?

☐ YES ☐ NO

Section 2. Other Permit Deviations

(a) Sources Involved:

Identify each emission source involved in the event, using the same identification number and name as in the permit. List any control device or monitoring system affected by the event. Attach additional sheets as necessary.

Source ID No.	Source Name	Description	Control Device
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

(b) Permit Condition Deviation:

Identify each permit condition deviation or potential deviation. Attach additional sheets as necessary.

Permit Condition	Potential Deviation
_____	_____
_____	_____
_____	_____

(c) Corrective Actions:

Attach a description of actions taken to correct the deviation or potential deviation and to prevent recurrence.

Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete.

Printed Name:

Signature:

Date:

Alaska Department of Environmental Conservation

Air Permits Program

December 2, 2002

BP Exploration (Alaska) Inc.

Grind and Inject Facility

STATEMENT OF BASIS

of the Terms and Conditions for

Permit No. 168TVP01

Prepared by Katherine Stringham

INTRODUCTION

This document sets forth the legal and factual basis for the terms and conditions of Operating Permit No. 168TVP01.

FACILITY IDENTIFICATION

Section 1 of Operating Permit No. 168TVP01 contains information on the facility as provided in the Title-V Operating Permit application.

The facility is operated by BP Exploration (Alaska) Inc., and owned by: BP Exploration (Alaska) Inc., Chevron U.S.A. Production Co., ExxonMobil Production Company, Forest Oil Corporation, Phillips Alaska, Inc., Texaco Exploration & Production Inc., and Union Oil Company of California. **BP Exploration (Alaska) Inc.** is the permittee for the facility's operating permit. The Grind and Inject Facility processes reserve pit materials and other production wastes for injection and disposal in a cretaceous well. A conveyor feed system moves frozen waste to a grinding system that thaws, grinds and then slurries the frozen material. This slurried material is then pumped to the disposal well where it is injected down-hole. The four digit SIC code is 1311 – Crude Petroleum and Natural Gas Production.

SOURCE INVENTORY AND DESCRIPTION

Table 1 of Operating Permit 168TVP01 contains information about the sources at the facility as provided in the application and describes the sources regulated by the permit. The table is provided for information and identification purposes only. Specifically, the source rating/size provided in the table does not create an enforceable limit.

EMISSIONS

Section 2 of Operating Permit No. 168TVP01 lists the regulated air contaminants as provided in the Title V application. Section 4 of Operating Permit No. 168TVP01 contains emission information as provided in the application. A summary of the potential to emit (PTE)¹ from the **Grind and Inject Facility** is shown in Table A below.

¹ *Potential to Emit or PTE* means the maximum quantity of a release of an air contaminant, considering a facility's physical or operational design, based on continual operation of all sources with the facility for 24 hours a day, 365 days a year, reduced by the effect of pollution control equipment and approved state or federal limitations on the capacity of the facility's sources or the facility to emit an air contaminant, including limitations such as restrictions on hours or rates of operation and type or amount of material combusted, stored, or processed...as defined in AS 46.14.990(21), effective 1/18/97.

Table A - Emissions Summary, in Tons Per Year (tpy)

Pollutant	NO _x	CO	PM-10	SO ₂	VOC	Total
PTE	16	13	1	2	1	33
Assessable Potential to Emit (TPY) per 18 AAC 50.346(a)(1) note 4.	0	0	0	0	0	0

The estimated potential emissions at the facility are based on emission factors in AP-42, Table 1.4-1 (July 1998). Emissions at the facility include combustion source emissions from Seawater Heater tag number 09-1401.

Although the seawater heater is not subject to 40 CFR 60 Subpart Dc, the heater is rated at 32.9 MMBtu/hr and has potential emissions greater than 5 TPY of CO and 2 TPY of NO_x; therefore, the heater is significant according to 18 AAC 50.335(r)(2) and (t)(5). However, for non-major facilities that only need a permit because they have a source subject to EPA's *National Emission Standards for Hazardous Air Pollutants* or *New Source Performance Standards* only the emissions from the source subject to the emission standards are counted as assessable emissions.

BASIS FOR REQUIRING AN OPERATING PERMIT

Section 2 of Operating Permit No. 168TVP01 includes a description of the regulatory classifications of the **Grind and Inject Facility**. This facility, which is a "minor" (less than 100 ton per year emitting) source, requires an operating permit under 18 AAC 50.325(b)(3) solely because it is a facility containing a source subject to the standards adopted by reference in 18 AAC 50.040 (a)(2)(FF). Since the facility only requires a permit because it is subject to a federal NSPS, the permit is not required to contain a citation of any emission standard listed in 18 AAC 50.050 – 18 AAC 50.075. Additionally, prohibitions listed in 18 AAC 50.045 as well as the nuisance provisions of 18 AAC 50.110 have not been included because a specific compliance problem related to these provisions has not been identified.

Provisions of 18 AAC 50.335(e) require operating permit applications to include identification of "regulated sources." As applied to the **Grind and Inject Facility**, the state regulations require a description of:

- ⇒ Each source subject to a standard adopted by reference in 18 AAC 50.040 under 18 AAC 50.335(e)(2)

The emission sources at the **Grind and Inject Facility** classified as "regulated sources" according to the above department regulations are listed in Table 1 of Operating Permit No. 168TVP01.

CURRENT AIR QUALITY PERMITS

No previous air quality control permit-to-operate exists for this facility.

Construction Permits

No construction permits have been issued for this facility after January 18, 1997 (the effective date of the new divided operating and construction-permitting program).

Title V Operating Permit Application History

The owner or operator submitted an application on November 20, 1997.

The owner or operator amended this application on January 20, 1998 and on April 28, 1998.

Additional information was received via email on November 27, 2001.

COMPLIANCE HISTORY

The facility has operated at its current location since 1994. Review of the permit application files for this facility and past inspection reports indicate that the Grind and Inject facility is operating in compliance with applicable state and federal requirements.

LEGAL AND FACTUAL BASIS FOR THE PERMIT CONDITIONS

Legal Basis: The state and federal regulations for each condition are cited in Operating Permit No. **168TVP01**.

Conditions 1 - 2 Fee Requirements

Legal Basis: [18 AAC 50.350(c) & 18 AAC 50.400 – 420, 1/18/97]

The regulations require all permits to include due dates for the payment of fees and any method the permittee may use to re-compute assessable emissions.

Factual Basis: These conditions require the permittee to pay fees in accordance with the department's billing regulations. The department's billing regulations set the due dates for payment of fees based on the billing date.

The gas-fired heater is not subject to any emission standard in the NSPS. Therefore, according to note number 4 of 18 AAC 50.346(a)(1), there are no emission fees.

Conditions 3 – 6, NSPS Subpart A Requirements

Applicability The department has adopted by reference the NSPS effective July 1, 1999, for specific industrial activities, as listed in 18 AAC 50.040. However, EPA has not delegated to the department the authority to administer the NSPS program as of 15 August 2001.

Most (with the exception of some storage tanks) sources subject to an NSPS standard are subject to Subpart A. The Grind and inject facility operates sources that are affected by NSPS Subpart OOO. Therefore, the affected facilities are subject to relevant provisions of Subpart A.

The permittee has already complied with the notification requirements in **40 C.F.R. 60.7 (a)(1) - (4)** for the existing NSPS sources subject to Subpart A.

The requirements to notify the EPA and the department of the date of a continuous monitoring system of performance demonstration, no less than 30 days before demonstration commences (**40 C.F.R. 60.7(a)(5)**) are applicable to existing NSPS sources subject to Subpart A. The requirements to notify the EPA and the department of any proposed replacement of an affected facility (**40 C.F.R. 60.15**) apply in the event of a proposed replacement (see condition 3).

Recordkeeping requirements in **40 C.F.R. 60.7(b)** are applicable to all NSPS sources subject to Subpart A (see condition 3).

Recordkeeping requirements in **40 C.F.R. 60.7(f)** are applicable to all NSPS sources (satisfied by condition 27).

Good air pollution control practices in **40 C.F.R. 60.11** are applicable to all NSPS sources subject to Subpart A (see condition 4).

Factual Basis: Relevant general provisions of 40 CFR 60, Subpart A apply to owners or operators who are subject to a relevant subpart under Part 60, except when otherwise specified in an applicable subpart or relevant standard. The intent of Subpart A is to eliminate the repetition of requirements applicable to all owners or operators affected by NSPS.

Conditions 7 - 11, NSPS Subpart OOO Requirements

Applicability: The affected facilities are enclosed in a building; therefore, the standards under 40 CFR 60.672(e) prevail.

Factual Basis: The permittee has chosen the option of complying with the limits under §60.672(e)(1) & (2). Since the permittee elected to comply with the limits of §60.672(e)(2), §60.672(a) also applies. Compliance with §60.672(a) is determined through the test methods and procedures in §60.675(b) and (d). Additionally, the permittee shall comply with the emission limits specified in 40 CFR 60.672(h) and the reporting requirements in §60.676(f). Note that §60.675(b) requires the permittee to determine compliance with the PM and Opacity standards of §60.672(a) by Method 5 or 17 and Method 9 which must be reported according to §60.676(f).

Condition 12, Asbestos NESHAP

Applicability: The asbestos demolition and renovation requirements apply if the permittee engages in asbestos demolition or renovation.

Factual Basis: The condition requires the permittee to comply with asbestos demolition or renovation requirements in 40 C.F.R. 61, Subpart M. Because these regulations include adequate monitoring and reporting requirements and because the permittee is not currently engaged in such activity, simply citing the regulatory requirements is sufficient to ensure compliance with these federal regulations.

Condition 13, Refrigerant Recycling and Disposal

Applicability: Applies if the permittee engages in the recycling or disposal of certain refrigerants.

Factual Basis: The condition requires the permittee to comply with the standards for recycling and emission reduction of refrigerants set forth in 40 C.F.R. 82, Subpart F, that will apply if the permittee uses certain refrigerants. Because these regulations include adequate monitoring and reporting requirements and because the permittee is not currently engaged in such activity, simply citing the regulatory requirements is sufficient to ensure compliance with this federal regulation.

Condition 14, Technology-Based Emission Standard

Applicability: Technology Based Emission Standard requirements apply to the facility because the facility contains equipment subject to a technology-based emission standard, such as BACT, MACT, NSPS, or other “technologically feasible” determinations.

Factual Basis: The permittee is required to take reasonable steps to minimize emissions if certain activity causes exceedance of any technology-based emission standard in this permit. The conditions of this permit list applicable technology-based emission standards and require excess emission reporting for each standard in accordance with condition 28. Excess emission reporting under condition 28 requires information on the steps taken to minimize emissions, the report required under condition 28 is adequate monitoring for compliance with this condition.

Condition 15, Permit Renewal

Applicability: Applies if the permittee intends to renew the permit.

Factual Basis: The permittee is required to submit an application for permit renewal by the specific dates applicable to the **Grind and Inject Facility** as listed in this condition. Monitoring, recordkeeping, and reporting for this condition consist of the application submittal. No additional requirements are necessary to ensure compliance with this condition.

Condition 16, Requested Source Tests

Applicability: Applies because this is a standard condition to be included in all permits.

Factual Basis: The permittee is required to conduct source tests as requested by the department. Monitoring consists of conducting the requested source test, and no recordkeeping or reporting requirements are necessary to ensure compliance with this condition.

Conditions 17 - 19, Operating Conditions, Reference Test Methods, Excess Air Requirements

Applicability: Apply because the permittee is required to conduct source tests by this permit.

Factual Basis: The permittee is required to conduct source test as set out in conditions 17 through 19. These conditions supplement the specific monitoring requirements stated elsewhere in this permit. The test reports required by condition 23 adequately monitor compliance with conditions 17 through 19, therefore no additional MR&R requirements are necessary to ensure compliance with these conditions.

Conditions 20 - 23, Test Deadline Extension, Test Plans, Notifications and Reports

Applicability: Apply because the permittee is required to conduct source test by this permit.

Factual Basis: Standard conditions 18 AAC 50.345(l) - (o) are incorporated through these conditions. Because these standard conditions supplement specific monitoring requirements stated elsewhere in this permit no MR&R is required. The source test itself is adequate to monitor compliance with this condition.

Condition 24, Certification

Applicability: This is a standard condition to be included in all permits. Applies because every permit requires the permittee to submit reports.

Factual Basis: This condition requires the permittee to certify all reports submitted to the department. This condition supplements the reporting requirements of this permit, therefore no additional MR&R is necessary to ensure compliance with this condition.

Condition 25, Submittals

Applicability: Applies because the permittee is required to send reports to the department.

Factual Basis: This condition requires the permittee to send submittals to the address specified in this condition. Receipt of the submittal at the correct department office is sufficient monitoring for this condition. This condition supplements the reporting requirements of this permit, therefore no additional MR&R is necessary to ensure compliance with this condition.

Condition 26, Information Requests

Applicability: Applies to all permittees, and incorporates a standard condition

Factual Basis: This condition incorporates a standard condition in regulation, which requires the permittee to submit information requested by the department. Receipt of the requested information is adequate monitoring.

Condition 27, Recordkeeping Requirements

Applicability: Applies because the permittee is required by the permit to keep records.

Factual Basis: The condition restates the regulatory requirements for recordkeeping, and supplements the recordkeeping defined for specific conditions in the permit. The records being kept provide adequate evidence of compliance with this requirement, therefore, no additional MR&R is required.

Condition 28, Excess Emission and Permit Deviation Reports

Applicability: Applies when the emissions or operations deviate from the requirements of the permit.

Factual Basis: This condition satisfies two state regulations related to excess emissions - the technology-based emission standard regulation and the excess emission regulation. Although there are some differences between the regulations, the condition satisfies the requirements of each regulation.

The reports themselves and the other monitoring records required under this permit provide an adequate monitoring of whether the permittee has complied with the condition.

Therefore, no additional MR&R is necessary to ensure compliance with this condition.

Please note that there may be additional federally required excess emission reporting requirements.

Report any excess emissions, in accordance with condition 28, whenever the emission limits of condition 7 are exceeded.

Condition 29, NSPS and NESHAP Reports

Applicability: Applies to facilities subject to NSPS and NESHAP federal regulations.

Factual Basis: The condition supplements the specific reporting requirements in 40 C.F.R. 60 and 40 C.F.R. 61. The condition does not need any MR&R. The reports themselves are adequate monitoring for compliance with this condition.

Condition 30, Monitoring

Applicability: 18 AAC 50.350(d)(4)

Factual Basis: There is no routine monitoring required by the conditions of this permit. Therefore, the requirements of 18 AAC 50.350(d)(4) will be satisfied by the reporting requirements of 23, 28, and 29.

Condition 31, Annual Compliance Certification

Applicability: Applies to all permits.

Factual Basis: This condition specifies the periodic compliance certification requirements, and specifies a due date for the annual compliance certification. Because this requirement is a report, no MR&R is needed.

Conditions 32 - 38, Standard Conditions

Applicability: Applies because these are standard conditions to be included in all permits.

Factual Basis: These are standard conditions required for all operating permits.

Condition 39, Permit Shield

Applicability Applies because the permittee has requested a shield for the applicable requirements listed under this condition.

Factual Basis: The following table explains the permit shield requests and the department's applicability determination. The permit conditions sets forth the requirements that the department determined were not applicable to the facility, based on the permit application.

The table below identifies application shield requests that were denied, and the reason they were denied.

Table D - Permit Shields Denied

SHIELD REQUESTED FOR:	REASON FOR SHIELD REQUEST:	REASON FOR REQUEST DENIAL:
40 CFR 60.672(a)	Permittee elects to comply with 60.672(e); therefore the shielded standard do not apply.	Because the permittee elected to comply with 60.672(e)(1) & (2), 60.672(a) applies.
40 CFR 60 Subpart OOO §60.675(b)	The testing requirements of §60.675(b) do not apply unless the affected source is determining compliance with the standards of §§60.672(a), (b) and (c). BPXA elects to comply instead with the standards of §60.672(e).	§60.675(b) applies for determining compliance with the standards of §§60.672(a) as required by §60.672(e).
40 CFR 60.675(d), Initial Test Only	Obsolete requirement – completed as required	This condition applies because it is used for determining compliance with §60.672(e).
40 CFR 60.676(f), Reporting and Recordkeeping	Obsolete requirements – completed as required	This condition applies because the permittee is subject to §60.672.
40 CFR 60.676(g)	Facility is not seeking to comply with §60.670(d).	This condition applies because the permittee is subject to §60.672(h).
40 CFR 61 Subpart M §61.152 Air Cleaning	G & I facility does not conduct air cleaning	40 CFR 61 Subpart M §61.152 Air Cleaning is applicable because it applies to §61.145.

Conditions Not Included in the Permit

- This facility is not described in 18 AAC 50.325(b)(1) or (2) or (c), therefore, per 18 AAC 50.350(d)(1)(C), 18 AAC 50.055 was not included for significant or insignificant sources.
- 18 AAC 50.045(d) and 18 AAC 50.110 were not included because the seawater heater is a minor source and the department does not expect pollution problems with it.
- The requirement to file operating reports was not included because the report will provide no useful information to the department. The permittee is required to file reports for deviations.